

Appendix K



Comment from 7 year old attending a public meeting

Summary of Public Comments and Service Responses on the Draft Comprehensive Conservation Plan and Environmental Assessment for Great Bay National Wildlife Refuge and the Karner Blue Butterfly Conservation Easement

Introduction

In February 2012, the U.S. Fish and Wildlife Service (Service, we, our) completed the draft Comprehensive Conservation Plan and Environmental Assessment (draft CCP/EA) for Great Bay National Wildlife Refuge (Great Bay Refuge, the refuge), including the Karner blue butterfly conservation easement (conservation easement). The draft CCP/EA outlines three alternatives for managing the refuge. Alternative B is identified as the “Service-preferred alternative.”

We released the draft CCP/EA for 39 days of public review and comment from February 10 to March 19, 2012. We also held a public meeting in Newington, New Hampshire, on March 8, 2012, that was attended by 27 people. We evaluated all the letters and e-mails sent to us during that comment period, along with comments recorded at our public meeting. This document summarizes all of the substantive comments we received and provides our responses to them.

Based on our analysis in the draft CCP/EA and our evaluation of comments received on that document, we modified the Service-preferred alternative (alternative B) as originally presented in the draft CCP/EA and recommend this modified version to our Regional Director for implementation as the final CCP. It includes minor modifications to the management actions outlined under alternative B in the draft CCP/EA. We have determined that none of these changes warrants our publishing a revised or amended draft CCP/EA before submitting the final CCP to our Regional Director for approval.

Below we highlight some of the modifications we made in the final CCP.

1. We added a strategy under Objective 2.3, “Upland Shrubland” in the final CCP. In the draft CCP/EA under Objective 2.1, “Appalachian Oak-Hickory Forests,” we proposed to allow 41 acres of grassland and shrubland habitat to naturally transition to forest. Based on comments from New Hampshire Fish and Game (NHFG), we have decided to slightly modify this. In the final CCP, we still plan to allow these areas to naturally transition; however, we added an additional strategy that states, “Within 5 years, evaluate wildlife use and response in the 41 acres of grassland and shrubland we are allowing to naturally transition to forest (see objective 2.1). If these areas are providing regionally important habitat to shrubland-dependent species of conservation concern, evaluate whether the resources are available to actively manage these areas as shrubland, and adjust management accordingly, rather than allowing them to continue to transition to forest.”
2. We added a strategy under Objective 1.3, “Freshwater Impoundments and Peverly Brook System,” in the final CCP. Based on comments from NHFG, we have added the following strategy regarding sediment contamination: “Within 3 years of CCP approval, work with partners to detect and remove “hot spots” of DDT contamination in Upper Peverly Pond, if determined feasible, and contingent upon funding and staffing.”
3. We amended our existing strategy on evaluating the effectiveness of the Stubbs Pond fish ladder under Objective 1.3, “Freshwater Impoundments and Peverly Brook System,” in the final CCP. Based on comments from NHFG, we added the following language to the existing strategy, “If this evaluation recommends that the fish ladder be updated or repaired, we will implement those recommendations within 3 years of the review, or as soon as funding allows.”
4. We revised one of the strategies under Objective 2.2, “Forested and Scrub-Shrub Wetlands” to address a concern that New Hampshire Natural Heritage Bureau (NHB) had about protecting rare plant communities. Our new strategy states: “Inventory, map, and assess the quality of forested and scrub-shrub wetlands, including vernal pool habitat, rare plants, and rare natural communities. Identify actions that will sustain or enhance these areas, including treating invasive plants, as warranted.”

Our Regional Director will select one of the following for our final CCP:

- Our modified alternative B.
- One of the other alternatives analyzed in the draft CCP/EA.
- A combination of actions from among the alternatives analyzed in the draft CCP/EA.

The Regional Director will also determine whether a Finding of No Significant Impact (FONSI) is justified prior to finalizing the decision. The decision will be made after:

- Reviewing all the comments received on the draft CCP/EA, and our responses to those comments.
- Affirming that the CCP actions:
 - * Support the purpose and need for the CCP.
 - * Support the purposes for which the refuges were established.
 - * Help fulfill the mission of the National Wildlife Refuge System.
 - * Comply with all legal and policy mandates.
 - * Work to best achieve each refuge's vision and goals.

At the same time we release an approved final CCP, we will publish a notice of the availability in the *Federal Register*. That notice will complete the planning phase of the CCP process, and we can begin implementing the plan.

Summary of Comments Received

After the comment period ended on March 19, 2012, we compiled all of the comments we received, including all letters, e-mails, and comments recorded at public meetings. In total, we received 25 written responses. The responses we received represent 23 different signatures and 78 individual comments.

We received a variety of letters from local, State, and Federal governmental agencies, including the following:

- New Hampshire Department of Environmental Services–New Hampshire Coastal Program (NHCP)
- New Hampshire Division of Historic Resources (NDHR)
- New Hampshire Fish and Game Department (NHFG)
- New Hampshire Natural Heritage Bureau (NHB)
- Town of Newington, New Hampshire, Conservation Commission
- U.S. Environmental Protection Agency (EPA)

We also received comments signed by representatives from the following conservation organizations:

- Defenders of Wildlife
- Great Bay Resource Protection Partnership (GBRPP)
- Piscataqua Region Estuaries Partnership (PREP)
- Society for the Protection of New Hampshire Forests (SPNH)
- The Nature Conservancy (TNC)

In the discussions below, we address and respond to every substantive comment we received. Substantive comments are those that suggest our analysis is flawed in a specific way. Generally, substantive comments meet at least one of the following criteria:

- Challenge the accuracy of information presented.
- Challenge the adequacy, methodology, or assumptions of the environmental or social analysis and supporting rationale.
- Present new information relevant to the analysis.
- Present reasonable alternatives, including mitigation, other than those presented in the document.

Our discussion does not include responses to any comments we felt were non-substantive. For example, there were people who wrote us to thank us for hosting the public meetings, tell us that they thought the document was well written, or request copies of the draft CCP/EA on CD-ROM.

In order to facilitate our responses, we grouped similar comments together and organized them by subject heading. Directly beneath each subject heading, you will also see a list of unique letter identification (ID) numbers. Table K.1 at the end of this appendix relates each letter ID number to the name of the individual, agency, or organization that submitted the comment.

In several instances, we refer to specific text in the draft CCP/EA and indicate how the final CCP was changed in response to comments. The full versions of both the draft CCP/EA and the final CCP are available online at: <http://www.fws.gov/northeast/planning/Great%20bay/ccphome.html> (accessed May 2012). For a CD-ROM or a print copy, please contact staff at Parker River National Wildlife Refuge:

Parker River National Wildlife Refuge
6 Plum Island Turnpike
Newburyport, MA 01950
Phone: 978/465 5753
Email: fw5rw_prnwr@fws.gov

Service Responses to Comments by Subject

Purpose and Need

Document - Specific

(Letter ID#: 1, 3, 23, and 25)

Comment: We received several comments pointing out typographical, formatting, and grammatical errors.

Response: We fixed all of the typographical, formatting, and grammatical errors that were pointed out to us. We also noticed an error we made in chapter 3 of the draft CCP/EA under the heading, “Actions Common to All of the Alternatives.” On page 3-4 of the draft CCP/EA we listed actions common to all of the alternatives that we planned to discuss in further detail. Although this list included “Conducting wilderness and wild and scenic river reviews,” we failed to direct readers to the review that we conducted. Our wilderness review for Great Bay Refuge is included as appendix D in both the draft CCP/EA and final CCP. We found that the refuge did not meet any of the minimum criteria for wilderness, and therefore does not qualify for wilderness designation. We did not conduct a wild and scenic river review for Great Bay Refuge because no river or river segment occurs on the refuge. We apologize for any confusion this may have caused.

Comment: EPA commented that map 1.1 in the draft CCP/EA was difficult to read and that the legend for map 1.2 was incomplete.

Response: We updated both of the maps to be more clear. In particular, we made it easier to distinguish between the different conservation protection categories on map 1.1 and updated the legend on map 1.2 to ensure it explained all of the symbols and lines used on the map.

Comment: PREP suggested that we acknowledge their 2010 Comprehensive Conservation and Management Plan in our CCP. In particular, they asked us to mention restoration objective 1.10 from their plan: “Restore or enhance an additional 300 acres of salt marsh by 2020 through removal of tidal restrictions or invasive species management.” They suggested that the refuge could support this objective through the following actions:

- Restoring salt marsh sparrows to unoccupied sites.
- Removing nonessential dams on coastal rivers and streams, including Stubbs Pond Dam.
- Restoring and enhancing salt marsh habitat.

Response: We list PREP's 2010 Comprehensive Conservation and Management Plan as one of many regional conservation plans we consulted during the development of the CCP in the section on "National and Regional Plans and Conservation Initiatives" in chapter 1 of both the draft CCP/EA and final CCP. We agree that the restoration and enhancement of salt marsh habitat is an important component of their plan and a vital resource in the Great Bay Estuary. Our only difference of opinion is their interest in our removing Stubbs Pond Dam and attempting to restore the area to salt marsh. We respond to that comment below under "Freshwater Impoundments–Stubbs Pond." Otherwise, we feel that our proposed actions in the final CCP will help enhance the refuge's 36 acres of salt marsh habitat and support objective 1.10 in PREP's plan. We list these actions as strategies and monitoring under Objective 1.1, "Salt Marsh," in chapter 4 of the final CCP. Specifically, we will:

- Develop an index of ecological integrity for the refuge's salt marsh, measure baseline conditions, and manage the refuge's salt marsh to ensure that there is no degradation of ecological integrity.
- Monitor and control invasive species in the refuge's salt marsh.
- Work with partners to conduct research on, and surveys of, salt marsh sparrows in Great Bay Estuary; and
- Prohibit public access to the refuge's salt marsh habitat and provide information to refuge visitors about the importance of salt marsh to the health of Great Bay Estuary.

Comment: EPA felt our description of why the proposed action required an EA was unclear in chapter 1 of the draft CCP/EA.

Response: Service policy (602 FW 3.4(B)) requires that an EA or Environmental Impact Statement accompany, or be integrated into, each CCP. We discuss this under the section, "Refuge Planning and Management Guidance," in chapter 1 of both the draft CCP/EA and final CCP.

Comment: NHCP, NHFG, and EPA commented on several inconsistencies in the draft CCP/EA.

1. First, there was an apparent contradiction about the potential impacts of climate change on Stubbs Pond. On page 3-43 of the draft CCP/EA, we state, "A recent study commissioned by the Service reported that Stubbs Pond is unlikely to be affected by sea level rise as a result of climate change (Clough and Larson 2009), although more detailed analysis is needed." However, on page 4-43 we state, "The area of the refuge most at risk from sea level rise is Stubbs Pond."
2. Second, we list different costs for the removal of Lower Peverly Pond Dam and restoration of the area to stream habitat in two tables in Appendix E, "Refuge Operation Needs System (RONS) and Service Asset Maintenance Management System (SAMMS) Projects" of the draft CCP/EA. In table E.2, "Projects Proposed for the RONS Database for Great Bay Refuge under alternative B," we list an estimated one-time cost of \$200,000 and a recurring base cost of \$20,000. However, in table E.4, "Current Projects in the SAMMS Database for Great Bay Refuge," we list the cost as \$500,000.
3. Third, NHFG and NHCP felt we were inconsistent about the months in which the fish passage at Stubbs Pond is in operation on pages 2-30, 3-42, and 3-44 of the draft CCP/EA.
4. Fourth, NHFG noted that we used the terms blueback herring, alewife, and river herring inconsistently and noted that river herring is an umbrella term for both alewife and blueback herring.
5. Fifth, the EPA pointed out that we did not use consistent terminology to describe the process we followed to analyze environmental consequences in chapter 4 of the draft CCP/EA. In particular, they suggested that we change the phrase "cumulative influences of effects" with either "cumulative effects" or "cumulative impacts."

Response:

1. The two apparently conflicting statements about the impacts of climate change on Stubbs Pond are actually referring to different time scales. The statement on page 3-43 refers to potential short-term climate change impacts, while the statement on page 4-43 refers to anticipated longer-term impacts. To clarify, the point we are trying to make is that over the 15-year time span covered by the CCP, it is unlikely that Stubbs Pond will be measurably affected by climate change, but that over the long term, Stubbs Pond may be vulnerable to climate change and associated impacts. We understand why this may have been confusing to readers. In chapter 4 of the final CCP, we updated our rationale for Objective 1.3, “Freshwater Impoundments and Peverly Brook System,” to be clear that we do not anticipate climate change impacts to Stubbs Pond over the 15-year timeframe of the CCP.
2. The RONS database and SAMMS database each address different aspects of refuge management and operations. The \$500,000 cost listed in the SAMMS database (table E.4) refers to the estimated cost to remove the Lower Peverly Dam. The one-time \$200,000 and recurring \$20,000 costs listed in the RONS database (table E.2) refer to the costs related to planning and monitoring the dam removal and habitat restoration. We updated tables E.2 and E.4 in appendix E of the final CCP to make this distinction more obvious.
3. The descriptions of the fish ladder on pages 2-30, 3-42, and 3-44 of the draft CCP/EA all refer to different things:
 - Page 2-30 refers to how we have historically managed the fish ladder (late April to early July).
 - Page 3-42 describes how we propose to manage the fish ladder under alternative B of the draft CCP/EA (late April to mid-July).
 - Page 3-44 identifies that volunteers have observed blueback herring actually using the fish ladder during the month of May.

However, we understand why this may have been confusing to readers. We have updated our discussions of the fish ladder under the section on “Freshwater Impoundments– Stubbs Pond (Recent Management),” in chapter 3, and in the rationale Objective 1.3, “Freshwater Impoundments and Peverly Brook System,” in chapter 4, of the final CCP to make a clearer distinction.
4. We have decided to not use the umbrella term “river herring” in our final CCP. Instead, we have used the terms “blueback herring” and “alewife” throughout the final CCP to reduce confusion.
5. We agree that we could have been more consistent in our terminology about describing the process we used to analyze environmental impacts. We will make note of this for future documents that need to comply with the National Environmental Policy Act of 1969 (NEPA). However, we do not feel that this suggested modification would result in a substantive change to the analysis we conducted in chapter 4 of the draft CCP/EA, and therefore, do not feel a revised EA is warranted.

Alternatives**General***(Letter ID#: 13 and 19)*

Comment: NHB felt “comfortable” with either alternative B or alternative C because both included strategies to help conserve rare plants and natural communities. Another respondent “found it difficult to commit to one [alternative] 100 [percent],” but did not provide any specific reasons.

Response: We thank NHB and the other individual for their comments on our draft alternatives. Our final CCP includes all of the strategies to conserve rare plants and natural communities under alternative B of the draft CCP/EA. Please see our response below under “Rare Plants and Natural Communities” for more information on our management for these resources.

Alternative B- Habitat Diversity and Focal Species Emphasis (Service-preferred Alternative)

(Letter ID#: 7, 9, 10, 11, 12, 15, 16, 20, and 25)

Comment: The town of Newington Conservation Commission, SPNHF, GBRPP, TNC, NHFG, and three individuals supported the Service-preferred alternative B. Respondents specifically mentioned the following reasons for supporting alternative B:

- Actively managing to provide diverse habitats to support a range of native plant and wildlife species, especially those of conservation concern
- Helping to protect rare, threatened, and endangered species such as upland sandpiper (State endangered), Karner blue butterfly (federally endangered), and New England cottontail (Federal candidate species)
- Expanding public access and enhanced wildlife-dependent recreational opportunities, including evaluating expanding the refuge’s hunting program to include turkey hunting and a fall archery deer hunt
- Balancing recreational opportunities with maintaining ecological integrity
- Removing Lower Peverly Pond Dam and restoring the area to stream habitat to improve fish passage and restore natural flow processes
- Restoring estuarine habitats, including oyster reefs and eelgrass beds
- Working with partners to achieve conservation goals
- Committing to science-based conservation
- Controlling invasive species
- Restoring habitat and creating hibernacula for native bat species

Response: We appreciate the level of support for our preferred alternative. We have recommended alternative B from the draft CCP/EA for implementation, including all of the actions mentioned in these comments. Chapter 4 in the final CCP details our proposed management direction.

Global Climate Change

General

(Letter ID#: 1 and 18)

Comment: NHCP asked us to, “discuss the additional analysis the Service will conduct to further its understanding of the potential impacts of climate change on the refuge, and more specifically, Stubbs Pond.”

Response: We expect to increase our understanding of existing baseline conditions and potential impacts of climate change through increased monitoring. In chapter 4 of the final CCP, we identify strategies and monitoring activities related to climate change under the following objectives: Objective 1.1, “Salt Marsh,” Objective 1.2, “Intertidal and Shallow Estuarine Waters,” Objective 1.3, “Freshwater Impoundments and Peverly Brook System,” Objective 2.1, “Appalachian Oak-Hickory Forests,” and Objective 3.2, “Landscape-scale Conservation Partnerships.”

Comment: Defenders of Wildlife provided us with a set of criteria they developed to help evaluate how well CCPs incorporate climate change considerations.

Response: We thank Defenders of Wildlife for providing the climate change criteria. We used the document to review our draft CCP/EA and feel that we adequately addressed climate change. We also look forward to using the criteria to help improve our climate change analysis in future CCPs.

Refuge Administration

Staffing

(Letter ID#: 6, 15, and 25)

Comment: We received three comments on staffing. GBRPP and NHFG supported our proposal under alternative B for four new positions stationed at Great Bay Refuge. NHFG specifically stated that, “To achieve the vision and goals for [the refuge] presented in Alternative B of the draft CCP, the refuge needs its own staff on station.” Another individual felt that at least one staff member needs to be stationed at the refuge.

Response: We appreciate the support for our proposed staffing for Great Bay Refuge. We feel the positions we proposed in the Appendix F, “Staffing Chart,” of the draft CCP/EA would be instrumental in achieving our vision, goals, and objectives for the refuge. We are hopeful that Great Bay Refuge will eventually have its own staff stationed on the refuge. However, we are also realistic about the current economic and Federal budget situation and realize that this may not happen in the near term. As we note on the inside cover of the draft CCP/EA and final CCP, this document does not constitute a commitment for increases in staffing and budget. Rather, CCPs provide long-term, strategic guidance and describe the desired, future conditions for the refuge.

Facilities

(Letter ID#: 11, 15, and 17)

Comment: We received three comments on refuge facilities. One individual supported our proposal to remove unnecessary buildings and facilities on the refuge because “they serve no purpose and are too difficult to maintain.” The GBRPP supported our proposal to build a new refuge headquarters to support our proposed staff increase. Another individual enthusiastically supported a visitor contact facility.

Response: We appreciate the level of support for our proposed visitor contact station/refuge headquarters and removal of unnecessary buildings and facilities in the former Weapons Storage Area and on Fabyan Point, pending evaluations by the State Historic Preservation Officer (SHPO). Our proposals were discussed in chapter 3 of the draft CCP/EA on pages 3-10, 3-12, and 3-16 and are included in the final CCP, chapter 4, under the sections on “Refuge Staffing, Facilities, and Administration” and “Protecting Cultural Resources.”

Partnerships

(Letter ID#: 23)

Comment: EPA requested that we include additional information on PREP, including that it is one of 28 federally recognized estuary programs and focuses on Great Bay, Little Bay, and the Hampton/Seabrook areas. They also asked us to elaborate on how the partners listed on page 4-9 of the draft CCP/EA tie into the work that the refuge is doing to improve the health of the Great Bay Estuary watershed.

Response: We thank EPA for their suggestions. We have used this information to update our section on “Piscataqua Region Estuaries Partnership’s Comprehensive Conservation and Management Plan” in chapter 1 of the final CCP. We discuss these partnerships elsewhere in both the draft CCP/EA and final CCP. In the final CCP, we provide descriptions of our partners and the conservation work they do in the Great Bay Estuary in chapter 1 under the section on “National and Regional Plans and Conservation Initiatives” and in chapter 3 under the section on “Key Refuge Partnerships.” We also list the specific strategies and monitoring actions we will take with these partners under each of the objectives in chapter 4 of the final CCP.

Refuge Expansion and Land Acquisition

(Letter ID#: 4, 12, 16, and 25)

Comment: We received three comments in support of our proposal to further evaluate land protection focus areas. In particular, respondents supported efforts to protect additional habitat for the federally endangered Karner blue butterfly and the New England cottontail, a Federal candidate species. One individual further proposed that the Service create a “[Karner Blue Butterfly] National Wildlife Refuge.”

Both TNC and NHHF urged us to consider conducting our evaluation of focus areas sooner than proposed in the plan (within 5 years of CCP approval). NHHF felt that the proposed focus areas, particularly the Dover Focus Areas and Rollinsford Focus Areas, are “vulnerable to land use change and development” and that “the timing presented in the draft may be too slow to prevent loss of these critical New England cottontail habitats.”

Response: We appreciate the level of support for our proposal to further evaluate the land protection focus areas we identified in chapter 3 of the draft CCP/EA. In that evaluation, we will consider each area’s resource values, both from a regional and local perspective, and threats to those values, including development and other land use changes. Our plans are to complete this evaluation within 5 years; however, it could possibly be done sooner with partner support and additional staffing and funding. If our analysis determines that land protection by the Service should be pursued, we would seek approval from our Director to prepare a separate EA and Land Protection Plan at that time. For additional information about our proposal, please see the section on “Land Protection Focus Areas” in chapter 4 of the final CCP. We will also continue to work with other Service program staff and partners, who are evaluating conservation needs for New England cottontail across the region.

Comment: SPNHF was disappointed that the draft CCP/EA did not address the Service’s role in conserving the Hampton Salt Marsh estuarine system. They felt that the area is not currently conserved in a “coordinated manner” because of “highly fragmented ownership patterns.” They also stated that they own a number of parcels in the Hampton Salt Marsh area and “expressed a willingness to deed them to the Service should the expansion of either [Great Bay or Parker River Refuge] be possible.”

Response: We agree that the Hampton-Seabrook-Salsbury Marsh area is an important salt marsh community and is threatened by development and fragmentation. In chapter 3 of the draft CCP/EA (page 3-16), we describe this area as a land protection focus area for the refuge. Please see our previous response for more information on future land protection.

Physical Resources

Air Quality

(Letter ID#: 23)

Comment: EPA requested that we explain in greater detail in our air quality discussion that the town of Newington, New Hampshire, is “one of the most commercialized in the seacoast.” They also asked if we conducted any special management activities to maintain air quality because of the surrounding commercial development.

Response: Based on this comment, we added a sentence that the region around the refuge is heavily commercialized in the section on “Air Quality” in chapter 3 of the final CCP. We do not currently conduct any special air quality management activities, but we do try to limit the amount of emissions caused by our management on the refuge. The section on “Climate Change” in chapter 4 of the final CCP lists our strategies for reducing our greenhouse gas emissions.

Water Quality and Sediment Contamination

(Letter ID#: 25)

Comment: NHFG commented on water and sediment contamination. First, they recommended that we conduct our proposed assessment of water and sediment contamination in Lower Peverly Pond (Objective 1.3, page 3-91 of draft CCP/EA) sooner than “within 5 years of CCP approval.” They felt it was important for us to complete the assessment as soon as possible because the information would be needed for the permitting process to remove Lower Peverly Pond Dam. Second, they suggested that we look for “hot spots” of DDT, DDD, and DDE contamination in the sediments of Upper Peverly Pond. It was their understanding that DDT bioaccumulates in aquatic environments by attaching to sediments, but does not bioaccumulate in terrestrial environments. They felt we could reduce the risk of bioaccumulation in fish and birds by removing the contaminated sediments from the pond and storing them in a confined area on land.

Response: We agree that it would be best to start our assessment of water and sediment contamination in Lower Peverly Pond as soon as possible. However, the timing of this assessment will principally be driven by our ability to secure funding for it. We also greatly appreciate the suggestion to look for “hot spots” of DDT contamination. We have added this as a strategy under Objective 1.3, “Freshwater Impoundments and Peverly Brook System,” in chapter 4 of the final CCP. The timing and successful completion of this strategy will also depend upon successfully securing funding and staffing to implement it.

Biological Resources

Estuarine Habitats

(Letter ID#: 16)

Comment: TNC was very supportive of our proposal under alternative B in the draft CCP/EA to help conserve and restore estuarine habitats in Great Bay, including salt marsh, oyster reefs, and eelgrass bed. They wrote, “We hope refuge staff will play an active role with...key partners to accelerate [the restoration]...of Great Bay’s fragile ecosystem.” Although they recognized that the refuge’s initial focus would be on Nannie Island, Woodman Point, and Herods Cove, they hoped that in the future the refuge would be able to “participate in restoration activities throughout Great Bay Estuary.”

Response: We appreciate TNC’s support of our proposal to conserve estuarine habitats. We look forward to pursuing partnerships to collaborate on priority projects in these important habitats. We describe the actions we plan to take to conserve these habitats under the section on “Protecting the Rocky Shore” and under Objective 1.2 “Intertidal and Shallow Estuarine Waters,” in chapter 4 of the final CCP.

Comment: PREP requested that we add salt marsh habitat to our list of emphasized habitats, and that we recognize salt marsh sparrows as a focal species.

Response: We agree that salt marsh is an important habitat in Great Bay Estuary and supports breeding salt marsh sparrows, as well as wintering waterfowl, foraging wading birds, fish, shellfish, and rare plants. We emphasize the importance of this habitat under Objective 1.1, “Salt Marsh” in both the draft CCP/EA and final CCP. In chapter 4 of the final CCP, under Objective 1.1, “Salt Marsh,” we list our strategies to help conserve this habitat. We also include several specific strategies related to salt marsh sparrow conservation, including conducting surveys of, and research on, salt marsh sparrows.

Stream Habitat Restoration – Removal of Lower Peverly Pond Dam

(Letter ID#: 16, 25)

Comment: NHFG and TNC support our proposal under alternative B in the draft CCP/EA to remove Lower Peverly Pond Dam and restore the stream channel. However, NHFG urged us “to initiate planning, design, and permitting of this project as soon as possible “to ensure a “reasonable chance” that the project will be completed within 5 years of CCP approval.” They also offered to assist the refuge “in achieving a successful outcome for this project.”

Response: We appreciate the support for our proposal to remove Lower Peverly Pond Dam and look forward to working with partners to complete this project. We will begin the planning, design, and permitting of this project as soon as staffing and funding allow, which we hope will occur within the next few years. For more information on our proposed removal of Lower Peverly Pond Dam, please see Objective 1.3, “Freshwater Impoundments and Peverly Brook System” in chapter 4 of the final CCP.

Freshwater Impoundments—Stubbs Pond

(Letter ID#: 1, 14, and 25)

Comment: NHFG supported our proposal to maintain Stubbs Pond Dam under alternative B in the draft CCP/EA because the pond “is unique in the Great Bay ecosystem for its size and value to waterfowl, marsh birds, and other wetland wildlife.” However, PREP recommends that the final CCP should include the removal of Stubbs Pond Dam and the restoration of the area to salt marsh habitat. In particular, they felt that:

- Stubbs Pond represents the largest remaining opportunity in Great Bay Estuary to reconnect historic salt marsh habitat to tidal flows.
- Restoring the pond would provide salt marsh habitat which is important for salt marsh sparrows, a rare focal bird species.
- Restoring the pond would “reconnect the marsh with a more natural tidal hydrology and enable dynamic natural processes to maintain quality wildlife habitat in the long term.”
- Restoring the pond would increase Great Bay Estuary’s resilience and adaptation to climate change by allowing marsh migration with sea level rise and will mitigate against salt marsh loss elsewhere in the estuary.
- It is unclear what analysis we used to reach our assertion that the loss of Stubbs Pond would have a major impact of freshwater birds (In particular, they stated that it was unclear if freshwater birds are “in a population status as precarious as salt marsh-dependent birds, such as salt marsh sparrows.” Additionally, they felt that the impact on American black ducks would likely be less than we predicted because the species also uses salt marsh habitat for breeding).
- Maintaining Stubbs Pond is costly and management-intensive.
- Removing Stubbs Pond Dam complements our proposal to remove Lower Peverly Pond Dam and will improve upstream and downstream fish passage.

Response: We thank NHFG for their support of our proposal to remove Lower Peverly Pond Dam (see Objective 1.3, “Freshwater Impoundments and Peverly Brook System in chapter 4 of the final CCP). We also appreciate PREP’s comments on Stubbs Pond and agree that salt marsh habitat and associated wildlife species are important priorities. However, we feel that, at this time, the value of Stubbs Pond as a freshwater wetland outweighs any potential benefit from restoring the area to salt marsh. We identify Stubbs Pond’s values as a freshwater wetland in the draft CCP/EA in chapter 2 (page 2-29) and chapter 3 (pages 3-42 to 3-44). We base our recommendation to maintain the pond on that information, which we summarize below:

- Stubbs Pond has been identified by NHFG and TNC as one of the most important freshwater wetlands in Great Bay. A large diversity of plants, and wildlife use Stubbs Pond, including species listed as threatened or special concern. It provides important habitat to numerous migratory waterfowl, including black ducks, with a species diversity not found elsewhere in Great Bay Estuary. Restoring the pond to salt marsh would reduce or eliminate use by many of the waterfowl and waterbird species currently present. For example, if we permanently breached Stubbs Pond, we would expect to see major reductions in use by American wigeon, wood ducks, ring necked ducks, ruddy ducks, common mergansers, and American coots. In our opinion, the loss of biological diversity in Stubbs Pond, including Federal trust species, is not warranted given the speculative nature of the restoration outcome.
- Great Bay Refuge is only 1,103 acres in size and cannot effectively provide habitat for every species. We have carefully considered what habitats and species will be our priorities on the refuge based on what we feel the refuge's greatest contributions to regional populations are. Appendix B, "Process for Establishing Refuge Focal Species and Priority Habitats," in the draft CCP/EA and final CCP explains the process we used to identify our priority species. Although restoring the pond to salt marsh may benefit a small number of refuge focal species, it would negatively impact many more. Therefore, we do not feel that restoring Stubbs Pond to salt marsh at this time is consistent with the priorities for the refuge and NHFG.
- The salt marsh sparrow is one of the highest priority species within our region. However, Great Bay Refuge has only a small amount of fringe salt marshes which is insignificant on a regional scale when considering the species. Under Goal 1, Objective 1.1, "Salt Marsh," we are planning to "collaborate with partners to assess the salt marsh sparrow population around the bay and determine the relative importance of the refuge population to the Great Bay ecosystem and to the larger regional population." We do agree that the species is at risk from potential sea level rise, but feel there is not enough evidence to suggest that restoring Stubbs Pond to salt marsh significantly contributes to gains in the regional population. We believe efforts for salt marsh sparrows in other New Hampshire estuaries will have greater benefits.
- We respectfully disagree that removing Stubbs Pond Dam and restoring the area to salt marsh would "greatly" improve passage for migratory fish and have a "net beneficial effect on diadromus fish." While taking out the dam may initially improve passage for migratory fish, eventually beaver will begin to dam the stream. Once the beaver dam the stream, it will be difficult for alewife and blueback herring to move upstream because they are not strong jumpers and beaver dams are generally impassable barriers to them. The removal of the dam would have very little impact on American eel passage because eel are currently able to reach Upper Peverly Pond, despite the three existing dams.

We also feel that removing Stubbs Pond could negatively impact spawning habitat for alewife. Alewife prefer impoundments and slow-moving water for spawning. Removing the Stubbs Pond impoundment will result in a significant loss of potential spawning habitat for alewife. Although beavers would eventually create pools and impoundments of slow moving water in the stream, the alewife would be unable to reach them since they have difficulty passing beaver dams. Removing Stubbs Pond Dam would also not provide blueback herring spawning habitat over the long term. Initially, the removal of Stubbs Pond would result in the faster moving water that blueback herring prefer for spawning, but again, beaver activity would eventually create small pools and impoundments of slow moving water.

After considering the potential short-term and long-term effects described in chapter 4 of the draft CCP/EA, we determine that removing Stubbs Pond Dam will not result in a long-term improvement in fish passage and will likely negatively impact alewife. Instead, we feel that maintaining the existing impoundment and fish ladder benefits the most species overall. We acknowledge that PREP, NHCP, and others have concerns about the effectiveness of our current fish ladder. Although we know that blueback herring and American eel are able to use the existing fish ladder, we are committed to ensuring that the ladder is effective as possible. As described under Objective 1.3, “Freshwater Impoundments and Peverly Brook System” in both the draft CCP/EA and final CCP, we plan to work with NHFG and the Service’s Central New England Fisheries Program to evaluate the effectiveness of the fish ladder and determine if there are practicable opportunities to enhance the movement of fish migrating through the ladder. If this evaluation recommends that the fish ladder be updated or repaired, we will implement those recommendations within 3 years of the review, and as funding allows (also see our response under “Fish Passage” below).

Comment: NHFG and NHCP commented on our proposed water level management in Stubbs Pond.

1. NHFG felt that the water level management in Stubbs Pond must be carefully designed to reduce conflicts between “potentially conflicting objectives.” They requested that refuge staff consult with their marine fishery and wildlife biologists “to discuss the frequency, timing, and extent of water drawdowns at Stubbs Pond.” In particular, they were concerned about water level management during the fall because, if poorly timed, it can impede their duck banding program on the refuge and can prevent muskrats and beavers from reaching their winter huts.
2. Also, both NHFG and the NHCP felt that we should coordinate the release of water from Stubbs Pond with the tide cycle to “ensure the success of emigrating fish species.”

Response:

1. We appreciate NHFG’s comment on Stubbs Pond water level management and agree that it can be very challenging to meet multiple objectives. Because of this, we do not intend to meet all of our subobjectives (outlined under Objective 1.3, “Freshwater Impoundments and Peverly Brook System” in chapter 4 of the final CCP) in any given year, but rather we hope to meet each subobjective over the 15-year period of the CCP.

We can also appreciate the challenges of waterfowl banding in or near managed impoundments. In recent years the abundance of natural foods at Stubbs Pond, such as wild rice, has made it more challenging to attract waterfowl for the banding program using bait.

In years when we conduct fall drawdowns, we do not do an entire drawdown within a short timeframe. We instead conduct drawdowns gradually to expose foods for migratory waterfowl throughout the fall migration, and then we bring water levels back up for winter.

2. Stubbs Pond has a constant outflow of water through both the fish ladder and water control structure because of the continuous flow of water into the pond from Peverly Brook. Since the tidal cycle changes daily, we feel it is logistically impractical for us to regulate the discharge of water from Stubbs Pond to coincide with high tide or to restrict discharge during the low tide cycle. This would require staff to be available to adjust the water level four times a day over a 24-hour period, 7 days a week. This would also cause a highly fluctuating water level within the impoundment and compromise our ability to achieve our specific habitat target for migratory waterfowl during the fall migration under Objective 1.3a, “Stubbs Pond” as described under alternative B in the draft CCP/EA and included in chapter 4 of the final CCP. Also, in our observations, fish are still able to emigrate out of Stubbs Pond during the fall under our water level management.

Shrubland Habitat*(Letter ID#: 25)*

Comment: NHFG commented on our proposed shrubland management under alternative B in the draft CCP/EA. While they were very supportive of our proposal to increase shrubland habitat in the former Weapons Storage Area, they were “concerned about the loss of this habitat type outside of the [former Weapons Storage Area] as some grassland areas are allowed to revert to forest.” They recommended that we monitor and evaluate the grasslands areas south of the former weapons storage area and just north of Woodman Point as they revert, and consider maintaining them as shrubland if shrubland-dependent species appear to respond to the habitat. They stated that it was extremely important to maintain shrubland habitat on public lands because they are “transitional habitats that require continuing management to be sustained.” On private lands there is “no such assurance” of long-term ownership and active management.

Response: We appreciate NHFG’s comment and agree that shrubland habitats are important to many wildlife of conservation concern. Based on these comments, we have decided to add the following strategy under Objective 2.3, “Upland Shrubland,” in chapter 4 of the final CCP:

“Within 5 years of CCP approval, evaluate wildlife use and response in the 41 acres of grassland and shrubland we are allowing to naturally transition to forest. If these areas are providing regionally important habitat to shrubland-dependent species of conservation concern, evaluate whether the resources are available to actively manage these areas as shrubland, and adjust management accordingly, rather than allowing them to continue to transition to forest.”

Rare Plants and Natural Communities*(Letter ID#: 13 and 25)*

Comment: We received several comments on rare plants and natural communities.

NHB stated that their ecologists identified several stands of red maple-elm-lady fern silt forest on Great Bay Refuge in 1999. This community type is very rare in New Hampshire and there are no records of “exemplary” occurrences of it in the State. Although the refuge’s stands have invasive species present, they felt the community type is rare enough that it should be a management priority for the refuge. They wrote that the “primary management activity in this community type would be invasive species control” and that “priority should be given to the largest patches that are also....surrounded by intact forest.”

NHFG asked us to add two plant species of conservation concern to table A.2 in appendix A of the draft CCP/EA: the blunt-leaved milkweed (State threatened) and golden heather (State endangered). They also requested that we discuss the importance of wild rice as wildlife food and cover in the final CCP. The species, which is uncommon in the State, was introduced to Stubbs Pond within the last few decades and is now “well established” and “abundant.”

Response: We have added additional information on the rare red maple-elm-lady fern silt forest natural community type to the section on “Habitat Types and Associated Wildlife” in chapter 3 of the final CCP. As described under Objective 2.2, “Forested and Scrub-Shrub Wetlands” in chapter 4 of the final CCP, we will continue to inventory and control for invasive species in rare natural communities on the refuge. We revised a strategy under this objective to state: “Inventory, map, and assess the quality of forested and scrub-shrub wetlands, including vernal pool habitat, rare plants, and rare natural communities. Identify actions that will sustain or enhance these areas, including treating invasive plants, as warranted.” We also added blunt-leaved milkweed and golden heather to table A.2 in appendix A of the final CCP. Finally, we added a few sentences about the importance of wild rice in Stubbs Pond to our discussion on “Freshwater Impoundments” in chapter 3 of the final CCP.

Fish Passage

(Letter ID#: 1 and 25)

Comment: We received several comments on the fish ladder at Stubbs Pond from NHFG and NHCP. First, NHCP requested that we include a timeline in the final CCP for our proposal to evaluate the fish ladder and make any necessary improvements or repairs to improve fish passage. They also asked us to expedite both our evaluation and repairs.

Second, both NHFG and NHCP requested additional details about our proposed monitoring of the fish ladder, including how we will conduct the monitoring and how we will use the data gathered to make future management decisions. They also requested that any existing data we have about the type, number, and temporal distribution of fish using the fish ladder be included in our final CCP. Both agencies also asked when we would begin our monitoring program, and NHCP specifically recommended that we start to monitor water quality and quantity, migratory fish populations and their movements, and fish ladder operation and usage “immediately upon approval of the CCP.”

Response: Based on NHCP’s comments, we have amended our existing strategy on evaluating the Stubbs Pond fish ladder under Objective 1.3, “Freshwater Impoundments and Peverly Brook System” in chapter 4 of the final CCP. We added the following language to the strategy, “If this evaluation recommends that the fish ladder be updated or repaired, we will implement those recommendations within 3 years of the review, or as soon as funding allows.”

As far as existing data on use of the fish ladder, we have data from regular volunteer observations with specific dates of fish ladder use by blueback herring. Through several years of monitoring and operation of the fish ladder, we have observed that use of the fish ladder occurs in late spring, typically May through June, when blueback herring are migrating. We have not observed fish using the ladder during April, which is when we would expect alewife to be passing through. In addition, we do not have data on specific numbers of fish. We will continue to conduct this monitoring program. As for future monitoring of the fish ladder, we have identified monitoring components under Objective 1.3, “Freshwater Impoundments and Peverly Brook System” under alternative B in the draft CCP/EA and in chapter 4 of the final CCP. Our monitoring program will include volunteer monitoring of the fish ladder several times each week during the spring (April to mid-July) and weekly in the fall (September to November). We also added the following monitoring component in the final CCP: “Discuss the possibility of using automated monitoring with staff from the Service’s Fisheries Program.” Automated monitoring would allow us to get more accurate counts of fish.

We have also identified the need for monitoring with regard to water quality and quantity based on national standards under Objective 1.3, “Freshwater Impoundments and Peverly Brook System.” We did not include a timeframe for some of our monitoring components in the CCP because it is not clear at this time when we will receive adequate funding to support these activities. However, with partner assistance, we may be able to commit to monitoring much sooner. Our Habitat Management Plan and Inventory and Monitoring Plan will include greater details on the monitoring tools and techniques we will use, and the timing of our monitoring activities.

Comment: NHFG commented on our analysis of impacts to fish under alternative C in chapter 4 of in the draft CCP/EA. They pointed out that we discussed the short-term and long-term impacts of removing Stubbs Pond on alewife, but failed to discuss the impacts on blueback herring. They felt it would be more accurate to say that, over the short-term, “the removal of [Stubbs Pond Dam] would enhance passage for [alewife and blueback herring] and spawning habitat may become more favorable for blueback herring.”

Response: We acknowledge this information is accurate and should have been included in the draft CCP/EA, Chapter 4, “Environmental Consequences,” under the analysis of impacts to fish for alternative C. However, this information does not change our recommendation to continue to maintain Stubbs Pond Dam in the final CCP.

Threatened and Endangered Species*(Letter ID#: 25)*

Comment: NHFG commented on our proposed management for the federally endangered Karner blue butterfly and the New England cottontail, a Federal candidate species. First, they were supportive of the refuge's proposal to have an "expanded involvement" in the recovery of the Karner Blue butterfly and are "looking forward to working with the refuge to implement the strategies [for the species] outlined in Alternative B." They also felt that the refuge "can have a significant role in conserving additional lands for the protection and management [of the Karner blue butterfly] in the identified focus area." Second, they urged us to "move ahead with [the New England cottontail captive rearing] initiative without delay."

Response: We greatly appreciate NHFG's continuing effort and support in helping to recover the Karner blue butterfly. Based on these comments, we realized that we did not emphasize enough the work that we are doing in partnership with NHFG to conserve this species in the draft CCP/EA. We have decided to change the name of the final CCP to "Great Bay National Wildlife Refuge and Karner Blue Butterfly Conservation Easement Comprehensive Conservation Plan" to raise the visibility of the easement for the butterfly and the important work being done on the easement with our partners to help recover this federally listed species.

We also appreciate NHFG's support for our proposal to create a New England cottontail captive rearing program, as described under Objective 2.3, "Upland Shrubland" in chapter 4 of the final CCP. We hope to finish constructing a hardening pen by the end of 2012, and will continue to work with partners to evaluate starting a captive rearing program on the refuge.

Comment: NHFG pointed out that we did not include rankings for several fish species in table A.1 of appendix A in the draft CCP/EA that are listed as federally threatened or considered Federal species of concern by the National Marine Fisheries Service (NMFS) and National Oceanic and Atmospheric Administration (NOAA). In particular, they stated that alewife, blueback herring, and rainbow smelt are species of concern and that the Atlantic sturgeon is federally threatened.

Response: We thank NHFG for pointing out our omission. We have updated table A.1, "Species and Habitats of Concern Known, or Potentially Occurring, on Great Bay Refuge and Karner Blue Butterfly Conservation Easement" in appendix A of the final CCP to include this information. We would also like to note that the Atlantic sturgeon (Gulf of Maine distinct population segment) was listed as federally threatened in February 2012, just after the release of the draft CCP/EA.

Public Access and Use**Public Access and Public Use—General***(Letter ID#: 7, 10, and 25)*

Comment: We received three general comments on public use and access. One individual stated that he "really supports and enjoys" the current level of access on the refuge. Another individual and NHFG advocated opening up the refuge to greater public access. The individual wrote to, "strongly endorse increasing access to the area" and felt that "better public (taxpayer) access...would also help build local appreciation and support for...efforts on the refuge." NHFG stated that currently "most [of the refuge] is closed to the public" and felt that we would be unable to achieve goal 4, as described in the draft CCP/EA, "without greater public access to and interaction with the refuge." Although they recognized that without staff stationed at the refuge it would be difficult to greatly expand public access, they hoped "that eventually additional areas on the refuge, such as a Stubbs Pond overlook...can be developed to enhance public understanding...and support" of the refuge.

Response: We appreciate the desire for expanded public access to the refuge and agree that those opportunities may help build local support for the refuge. We are proposing expansions to our existing public use program under Objective 4.1, “Wildlife Observation and Photography,” Objective 4.2, “Environmental Education and Interpretation,” and Objective 4.3, “Hunting,” as described under alternative B in chapter 3 of the draft CCP/EA and in chapter 4 of the final CCP. We understand that some would like us to open new areas of the refuge. However, we believe our final CCP provides the level of public access that is commensurate with our highest priority to conserve and protect wildlife and their habitats and fulfill the purposes of the refuge. In addition, we feel this level of programming is reasonable and realistic for ensuring quality opportunities, given the levels of funding and staffing we expect for the foreseeable future. In response to the suggestion to provide an overlook of Stubbs Pond, under Objective 4.1, “Wildlife Observation and Photography,” we propose to construct a viewing platform on Fabyan Point within 10 years of CCP approval, assuming we can acquire a right-of-way, that there are not human safety concerns, and that it will not negatively impact wildlife. This proposed viewing platform would allow visitors to view Herods Cove and Stubbs Pond.

Hunting

(Letter ID#: 10, 11, 12, and 25)

Comment: SPNHF, NHFG, and two individuals supported our proposal to evaluate expanding the refuge hunting program. One respondent supported expanding the refuge’s hunt program in general, while SPNHF commented on the importance of managing deer populations through hunting to prevent negative impacts to other biological resources.

Another individual specifically supported a fall bow deer hunt. He stated that he had experience with similar types of deer bow hunts, that these types of hunts are “good land conservation” and “work really well,” and offered to assist with the refuge’s proposed program.

NHFG supported both the proposed fall bow deer hunt and the wild turkey hunt. They felt that the refuge’s current hunt program is “very conservative” and “encourage[d] the refuge to consider additional days of firearms hunting for deer.” They also stated that they “are available to discuss the management of increased hunting access at the refuge.”

Response: We thank SPNHF, NHFG, and the other individuals for their support of our proposal to evaluate expanding the refuge hunting program to include a fall bow hunt for deer and a turkey hunt. For more information on our proposal, see Objective 4.3, “Hunting” under alternative B in chapter 3 of the draft CCP/EA, or in chapter 4 of the final CCP. We appreciate that many would like us to accelerate the proposed expansion of hunting opportunities on the refuge, but our administrative requirements and NEPA require a more thorough evaluation than we were able to conduct with this CCP. However, as we state under Objective 4.3, “Hunting,” we propose to conduct this evaluation within 3 years of CCP approval.

Environmental Education and Interpretation

(Letter ID#: 7, 10, 17, and 22)

Comment: One individual “strongly endorse[d]...the development of educational opportunities within the refuge,” while another stated that he frequently uses the refuge as an educational resource. Another individual specifically requested that we develop interpretive and educational materials about important wildlife species and habitats in the region and make these available at the proposed visitor contact station. She specifically mentioned the following species and habitats: monarch butterflies, piping plovers, the Hampton/Seabrook Estuary, and the Audubon Society’s Important Bird Area.

Response: We agree that the refuge is a wonderful environmental education resource. We outline how we plan to improve and expand our environmental education program under Objectives 3.3, “Education and Outreach Partnerships” and 4.2, “Environmental Education and Interpretation” under alternative B in chapter 3 of the draft CCP/EA and in chapter 4 of the final CCP. We also plan to provide interpretive materials at the visitor contact station that relate to the species and habitat types that occur on the refuge. However, we would like to point out, that some of these enhancements depend upon having staff stationed at the refuge.

Bicycling

(Letter ID#: 5 and 21)

Comment: We received two comments on bicycling. One individual “heartedly endorse[d]” our proposal to support community proposals to build a connector between a regional bike trail to the refuge’s entrance road. Another individual offered to volunteer his time and expertise to help build mountain bike trails near or around the refuge and Pease Tradeport. He stated that there were “a lot of already unused and uncared for trails [in the area] that would be perfect” and that the area was “clearly the best choice in [Portsmouth, New Hampshire,] for this property is large and wooded as well as unused.” He felt it was “unfair for hikers to have a designated trail and not bikers” and that a bike “trail a few miles long would suffice.” Additionally, he felt it important to have separate trails for bicyclers to reduce conflicts with hikers and walkers and said that “otherwise I see people using non-bike paths as there is nowhere else for them to ride their bike.”

Response: We appreciate the support for the proposed connection between the regional bike trail and the refuge’s entrance road, as described under the section on “Climate Change” in chapter 3 of the draft CCP/EA (page 3-5), and incorporated into chapter 4 of the final CCP. We have been advocates for a regional bike trail and hope that this connection will give visitors an alternative means of access to the refuge. In response to the suggestion to construct mountain bike trails on the refuge, we have determined that this is not an appropriate use for the refuge. Although we agree that having separate biking and hiking trails can reduce user conflicts, the disturbance from mountain biking to wildlife and habitats would be too great to allow this use on the refuge. Please see our finding of appropriateness for “Bicycling Off Public Entrance Road,” in appendix C in the draft CCP/EA for more information on why we feel bicycling on refuge trails is not appropriate.

Cultural Resources

Heritage and Cultural Resources

(Letter ID#: 24)

Comment: NDHR commented on cultural, historic, and archaeological resources. They reviewed the draft CCP/EA and determined that it was “thorough and comprehensive” with regards to cultural resources. They stated that many areas of the refuge are “considered archaeologically sensitive” and have the potential to contain Native American sites or early historic sites. They felt that some of our proposed habitat management, public use, trail enhancements, and other ground-disturbing activities have the potential to directly or indirectly impact historic and cultural resources on the refuge. They requested that we continue to consult with them to help protect these resources.

Response: We take our responsibility to protect historic and cultural resources very seriously. We will continue to consult with them as we implement specific projects outlined in chapter 4 of the final CCP, particularly those that include ground-disturbing activities or have the potential to directly or indirectly impact historic and cultural resources.

Table K.1. Letter ID Numbers and Respondents

| Letter ID Number | Name or Organization |
|-------------------------|--|
| 1, 8 | New Hampshire Department of Environmental Services, New Hampshire Coastal Program (Christian Williams) |
| 2 | New Hampshire Division of Historic Resources (Edna Feighner) |
| 3 | Herb Lobsenz |
| 4 | Ward Feurt |
| 5 | Brian Giles |
| 6 | Jane Hislop |
| 7 | Justin Richardson |
| 9 | Newington Conservation Commission (Justin Richardson) |
| 10 | Charles H. Williams |
| 11 | Robert C. Lang |
| 12 | Society for the Protection of New Hampshire Forests (Paul Doscher) |
| 13 | New Hampshire Natural Heritage Bureau (Pete Bowman) |
| 14 | Piscataqua Region Estuaries Partnership (Derek Sowers) |
| 15 | Great Bay Resource Protection Partnership (Dea Brickner-Wood) |
| 16 | The Nature Conservancy (Doug Bechtel) |
| 17, 22 | Gayle Sweeney |
| 18 | Defenders of Wildlife (Julie Kates) |
| 19 | Charlie and Cheryl Lawrence |
| 20 | Deborah Carey |
| 21 | Nathaniel (no last name given; email correspondence) |
| 23 | U.S. Environmental Protection Agency (Jean Brochi) |
| 24 | New Hampshire Division of Historical Resources (Richard Boisvert) |
| 25 | New Hampshire Fish and Game (Glenn Normandeau) |